STATES OF THE

DEFENSE FINANCE AND ACCOUNTING SERVICE

1240 East Ninth Street Cleveland, OH 44199

MEMORANDUM FOR: Defense Privacy, Civil Liberties and Transparency Division

THRU: Records, Privacy and Declassification Division

SUBJECT: Justification for Use of Social Security Number (SSN) Department of Defense (DD) Form 2826, Trustee Report

- 1. This memorandum is written to satisfy the requirement established in the DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD" requiring justification of the collection and use of the SSN on DD Form 2826.
- 2. Pursuant to 10 U.S.C,. Chapter 73, subchapters II and III; DoDI 1332.42; DoD Financial Management Regulation (DoDFMR), Volume 7B, Chapter 42, Retired Pay and Chapter 46, Annuitant Pay and Executive Order 13478, the SSN is required for proper identification in the establishment or update of retired and annuity pay accounts. Retired and Annuity Pay Systems (RCPS), including the Defense Military Retiree and Annuity Pay System (DRAS), are designed to identify accounts by the retired member's SSN. There are no other methods to properly identify a member. It is also used to report on the administration of funds received on behalf of a mentally incompetent military retiree.
- 3. Collection of the SSN meets acceptable use(s) 2c. (4), Interactions with Financial Institutions; 2c. (7), Federal Taxpayer Identification Number, and 2c. (11), Legacy System Interface. The SSN is required to identify the member/annuitant in both the legacy systems and with financial institutions. It also is used to update retired/annuitant pay accounts and generate Federal, State and Local income tax statements which report taxable wages and withholding to the Federal, State and Local tax agencies. The lack of an SSN would create a risk that improper payments could be made to ineligible beneficiaries and the Disbursing or Certifying Officer could not certify the payment as required in 31 U.S.C. 3325.
- 4. The paper forms and copies of the form are secured to protect Personally Identifiable Information (PII) in accordance with DoD regulations. The data on the form is covered by System of Records Notice: T7347b, Defense Military Retiree and Annuity Pay System Records, (https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/)

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- 5. The SSN will no longer be a required element on the DD 2826 when DRAS2 activates. Estimated date of completion is 2022. The form will be updated to include the DoD ID number at that time.
- 6. The point of contact for this action is Mr. Charles A. Moss, Special Reviews, DFAS QPA Team, DFAS Cleveland. He may be reached at (216) 204-4426 or via email at charles.a.moss16.civ@mail.mil

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